

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

UNITED STATES OF AMERICA)
)
v.)
) CR. NO. 3:06CR210-MEF
MELISSA WARD)
)

MOTION TO CONTINUE OR
RESCHEDULE PRETRIAL CONFERENCE

Defendant Melissa Ward, through counsel, moves this Honorable Court to reschedule the pretrial conference of this case, and as grounds for this Motion says:

1. The Court scheduled a pretrial conference in this matter on November 13 at 1:00 p.m.
2. Counsel for Defendant Ward, appointed under the Criminal Justice Act, has a conflict with that date and time. Counsel's father is scheduled to see a neurologist regarding counsel's father's problems, and counsel must be present in that meeting. If the Court needs further information, counsel will be happy to provide further information. However, it is important that counsel appear for that doctor's visit with his father.
3. Counsel's associate, Todd E. Hughes, does not handle criminal matters as a general matter, and has handled very few criminal matters in ten years of practice. Accordingly, it is not reasonably practicable for Mr. Hughes to cover the pretrial, and counsel prefers to attend so that rescheduling the pretrial conference is requested.
4. Counsel for Defendant is available for the pretrial conference on the morning of November 13, or after 3:30 on November 13, or any time on November 10, 14, 15, 20, or 21.

WHEREFORE, for good cause shown, counsel for Defendant Ward moves this Honorable Court to reschedule the pretrial conference in this matter as noted above.

____ Respectfully submitted this the 26th day of October, 2006.

s/ C. E. Vercelli, Jr.

CHARLES E. VERCELLI, JR. (VER003)

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CERTIFICATE OF SERVICE

I hereby certify that on October 26, 2006, I electronically filed the foregoing with the Clerk of the United States District Court for the Middle District of Alabama, using the CM/ECF system, which will send notification of such filing to the United States Attorney and to all counsel of record.

s/ C. E. Vercelli, Jr.

Of Counsel

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